

District Judge John C. Coughenour

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

HARAM CORPORATION, a Washington  
for profit Corporation, d/b/a DREXEL  
DELI & GROCERY,  
NAI KYU LEE, an Individual,  
MYUNG H. LEE, an Individual, and  
MYUNG HEE LEE, an Individual,

Plaintiffs,

v.

UNITED STATES OF AMERICA,  
Defendant.

Case No. 2:18-cv-01651-JCC

**STIPULATED MOTION TO STAY  
DISCOVERY AND EXTEND DEADLINES**

**Noted for Consideration:  
November 27, 2019**

Plaintiffs, HARAM CORPORATION, a Washington for profit Corporation, d/b/a DREXEL DELI & GROCERY, NAI KYU LEE, an Individual, MYUNG H. LEE, an Individual, and MYUNG HEE LEE, an Individual, and Defendant, UNITED STATES OF AMERICA, by and through their undersigned counsel, hereby move the Court to stay discovery and extend all remaining deadlines by forty-five (45) days to allow the parties to continue to explore settlement.

**CASE HISTORY AND BACKGROUND**

1. Plaintiffs filed a Judicial Appeal of the Defendant's permanent disqualification of the Plaintiffs from the Supplemental Nutrition Assistance Program pursuant to 7 U.S.C. § 2023. Plaintiffs were disqualified upon allegations of trafficking by the Defendant.

2. With respect to these proceedings, on March 12, 2019, a status conference was held, and a Minute Entry regarding the Status Conference was entered. The Court set a trial date of December 16, 2019, and a discovery cutoff date 120 days before trial, August 16, 2019 (*See* Docket

16).

3. On June 20, 2019 the Court entered a Minute Order on the parties' stipulated motion to extend discovery and all remaining deadlines and to continue the trial date. Pursuant to that Minute Order, trial in this matter is currently set for March 30, 2020, and the discovery cutoff is 120 days before trial, December 1, 2019 (*See* Docket 20).

**INTERVENING CIRCUMSTANCES AND JOINT MOTION TO  
STAY DISCOVERY AND EXTEND DEADLINES BY FORTY-FIVE DAYS**

4. Since the entry of the Court's June 20, 2019 Minute Order, the parties have been conducting discovery, taking depositions, and working together to comply with the Court's deadlines.

5. The parties are currently engaged in settlement negotiations, and wish to continue exploring a possible settlement and resolution of this case.

6. The parties believe that it would be beneficial to their efforts to reach a resolution, and to avoid and reduce unnecessary or redundant costs, to extend the deadlines identified in the Court's June 20, 2019 Minute Order by forty-five (45) days to allow for a shift in focus from discovery to settlement.

**WHEREFORE**, for the reasons set forth above, the parties respectfully request that this Court enter an order extending the discovery deadline and all remaining deadlines by forty-five (45) days.

Respectfully submitted,

Dated: November 27, 2019

By: /s/ Andrew Z. Tapp  
Andrew Z. Tapp (FBN 68002)  
*Pro Hac Vice*  
METROPOLITAN LAW GROUP, PLLC  
1971 W. Lumsden Road, #326  
Brandon, Florida 33511-8820  
Telephone: (813) 228-0658  
Email: andrew@metropolitan.legal

STIPULATED MOTION  
Case No. C18-1651-JCC - 2

METROPOLITAN LAW GROUP, PLLC  
1971 W. LUMSDEN ROAD, #326  
BRANDON, FLORIDA 33511-8820  
TELEPHONE: (813) 228-0658

and

By: /s/ Stephen Pratt Hokanson

Stephen Pratt Hokanson, Esq. (WSBA 48519)

CHAE LAW FIRM, P.S.

15 S. Grady Way, Ste. 410

Renton, Washington 98057

Telephone: (425) 260-3136

Email: pratt@chaelawfirm.com

**COUNSEL FOR PLAINTIFFS, HARAM CORPORATION D/B/A  
DREXEL DELI & GROCERY, NAI KYU LEE, AN INDIVIDUAL,  
MYUNG H. LEE, AN INDIVIDUAL, AND MYUNG HEE LEE,  
AN INDIVIDUAL**

BRIAN T. MORAN

United States Attorney

Dated: November 27, 2019

By: /s/ Ashley C. Burns

ASHLEY C. BURNS, NY Bar #5186382

Assistant United States Attorney

700 Stewart Street, Suite 5220

Seattle, WA 98101-1271

Telephone: (206) 553-7970

Email: Ashley.burns@usdoj.gov

**COUNSEL FOR DEFENDANT  
UNITED STATES OF AMERICA**

1  
2 PURSUANT TO STIPULATED MOTION, IT IS SO ORDERED

3 IT IS FURTHER ORDERED that the discovery deadline and all remaining deadlines shall  
4 be extended by forty-five (45) days, and that the March 30, 2020 trial date shall be continued to a  
5 later date to be determined by the Court.

6 DATED: November \_\_, 2019  
7

8 

---

JOHN C. COUGHENOUR  
9 United States District Court Judge  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27